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**Not for service*

May 10, 2024

BY E-MAIL AS A .PDF

Hector Roman, Esq.
Homdat Kris Misra, Esq.
Law Office of Hector M. Roman, P.C.
108-14 Jamaica Avenue
Richmond Hill, NY 11418

Re: *Adam White v. Sholem Klein, et al., 23-cv-06924 (RER)(MMH)*

Good evening, Counsel:

I write as a courtesy to follow up on the requests for documents and information made during Defendant Klein's deposition on April 11, 2024 and May 10, 2024. Defendant Klein's full and complete written, signed and/or verified responses and objections to the requests for information and documents made at his April 11, 2024 deposition are due on Monday, since the 30-day deadline will run on the weekend. *See, e.g., New Falls Corp. v Soni*, 2020 US Dist LEXIS 94747, at *13-14 (EDNY May 29, 2020 (collecting cases)). For the sake of convenience, we have listed them below. Please either confirm that they will come on Monday or let us know when on Monday we can meet and confer.

1. Produce records related to any work that was done on the SUV, both by Defendant Klein's brother and by J&J Collision shop (Tr. 104-105).
2. Produce all records related to Mr. Klein's participation in the 14-week NYPD Citizens Police Academy training (Tr. 21-22).
3. Produce Moses Friedrich's business address and phone number (Tr. 22).
4. Produce Elkanah Adelman's business address and phone number (Tr. 61).
5. Produce Shmuly Kassover's business address and phone number (Tr. 61).
6. Produce a copy of the lease from the SUV Mr. Klein possessed on August 5, 2022 and November 11, 2022 (Tr. 67).
7. Identify Joel Rutner's business address and phone number (Tr. 68-69).
8. Produce a copy of lease from the Chevy Tahoe SUV Mr. Klein currently possesses (Tr. 69-70).

9. Provide Defendant Klein's brother Yoely Klein's business address and phone number for company that does tinting work (Tr. 71).

10. Provide the first name, business address, and phone number of Mr. Gutman (Defendant Klein's accountant) (Tr. 73).

11. Identify the name of Defendant Kleins' brother Yoely Klein's company that does tinting work (Tr. 74).

12. Provide the business address and phone number of J&J Collision shop (Tr. 104).

13. Produce records related to any work done on the SUV by or on behalf of Joel Rutner (Tr. 104-105).

14. Produce texts, e-mails, or other records reflecting communications between or among Defendant Klein, his brother, Joel Rutner, or the dealerships where the SUV Defendant Klein leased in 2022 and 2023 came from, including any invoices or bills and records regarding payments that were made for the leases or any work on the SUV (Tr. 106).

15. Produce records regarding the purchase or replacement of the license plate covers on the SUV in 2022 and 2023 (Tr. 106).

16. Produce the metadata from the photos Defendant Klein produced in his discovery responses. (Tr. 110).

17. Produce all pictures that relate to Mr. White or Defendant Klein's interactions with him on August 5, 2022 or November 11, 2022, including metadata. (Tr. 115).

18. Identify Defendant Klein's iCloud account name and any other identifying information (Tr. 119).

19. Produce all additional pictures of the SUV from 2019 through 2022 that have not yet been disclosed. (Tr. 119-120).

20. Produce all communications from Defendant Klein's family WhatsApp group between 2022 and the present regarding Mr. White, the incident, or this lawsuit. (Tr. 121).

21. Produce all photographs of Defendant Klein's SUV from the WhatsApp group between 2019 and the present. (Tr. 121).

22. Produce copies of the SUV's registration during August 2022 and November 2022. (Tr. 122).

23. Provide the business address and phone number of Goldie Klein (Defendant Klein's sister-in-law. (Tr. 123).

24. Identify the drop-off/traffic ticket company that Defendant Klein testified he used to handle tickets, including, but not limited to, by providing its specific address and phone number. (Tr. 125-127).

25. Produce all documents reflecting payments to that company related to any kind of tickets, summonses or notices of violation, between 2019 and the present. (Tr. 127)

26. Identify the name, address, and phone number of the car wash Defendant Klein testified that he used for buffing out scratches the paint on the SUV. (Tr. 179-180)

27. Produce all messages that were forwarded to Defendant Klein on any social media platform (including Twitter) that he says were harassment and/or embarrassing him after August 5, 2022 and November 11, 2022, as well as any responses thereto. (Tr. 183).

28. Identify anyone who communicated with Defendant Klein about the August 5, 2022 and November 11, 2022 incidents, including, but not limited to, all six of his brothers, and all of his brother-in-laws, other family members, and each of the "lot of different people" he testified about. (Tr. 185-186, 188-189).

29. Produce a copy of the Rockaway Nassau Safety Patrol Community Patrol Volunteer identification Mr. Klein had in his wallet on November 11, 2022. (Tr. 210).

30. Produce cell phone records reflecting the calls between Defendant Klein and representatives of the Office of the Kings County District Attorney between November 11, 2022 and November 29, 2022. (Tr. 233).

31. Identify the person Defendant Klein testified had a store down the block from the incident location, whom Defendant Klein claimed had complained to him about someone damaging his vehicle.

Thank you for your attention to this matter.

Yours,

/S/

Gideon Orion Oliver